

UNITED STATES DISTRICT COURT
DISTRICT OF NEW JERSEY

-----X

IN RE INSURANCE BROKERAGE MDL No. 1663
ANTITRUST LITIGATION.

Civil No. 04-5184 (CCC-JAD)

APPLIES TO ALL ACTIONS

Hon. Claire C. Cecchi

-----X

**NOTICE OF JOINT MOTION FOR AN ORDER (1) ALLOWING INTERVENTION OF
CERTAIN PURCHASING GROUPS¹ AND PREFERRED CONCEPTS, LLC; (2)
APPROVING PROCEDURES TO IDENTIFY SETTLEMENT CLASS MEMBERS² WHO
PURCHASED A SETTLEMENT CLASS POLICY; AND (3) AN AWARD OF
ATTORNEYS' FEES AND REIMBURSEMENT OF EXPENSES**

To: All Parties and their Counsel:

PLEASE TAKE NOTICE THAT the Class Plaintiffs, the Purchasing Groups, and Preferred Concepts, LLC ("Preferred") by their counsel, hereby move this Court for an Order: (1) allowing intervention of the Purchasing Groups and Preferred Concepts, pursuant to Rule 24 of the Federal Rules of Civil Procedure, for the sole purpose of participating in a process to distribute proceeds of the Zurich Settlement which are currently being held by Preferred; (2) approving a procedure to identify certain Settlement Class Members that were members of various Purchasing Groups; and (3) approving attorneys' fees and reimbursement of expenses to Class Counsel and counsel to Preferred.

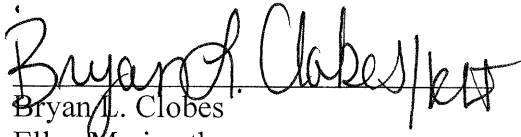
In support of the Motion, the movants rely on the accompanying Joint Declarations of Joel Simon and Terry Cummings and Bryan Clobes, and Stipulation and proposed Order.

¹ The Purchasing Groups are Integrated Risk Facilities, Inc., IRF Contracting Group, Inc., IRF Hospitality Group, Inc., IRF Manufacturing Group, Inc., IRF Real Estate Group, Inc., IRF Restaurant, Inc., IRF Retail Group, Inc., IRF Service Group, Inc., IRF Wholesale Group, Inc., and Protector Purchasing Group, Inc. (the "Purchasing Groups").

² Unless otherwise stated, all capitalized terms have the meaning ascribed to them in the Stipulation of Settlement dated July 28, 2006 (Dkt. No. 648), as amended (Dkt. No. 674).

Date: June 13, 2014

Respectfully submitted,


Bryan L. Clobes

Ellen Meriwether

CAFFERTY CLOBES MERIWETHER & SPRENGEL LLP

1101 Market Street, Suite 2650

Philadelphia, PA 19107

Tel.: (215) 864 2800

Fax: (215) 864 2810

Joe R. Whatley, Jr.

Edith M. Kallas

WHATLEY KALLAS LLP

1180 Avenue of the Americas

20th Floor

New York, NY 10036

Tel.: (212) 447-7060

Fax: (800) 922-4851

Plaintiff's Co-Lead Counsel on Behalf of Class Counsel

Joel M. Simon

SMITH MAZURE DIRECTOR WILKINS

YOUNG & YAGERMAN, P.C.

111 John Street

New York, New York 10038

Tel.: (212) 964 7400

Fax: (212) 374 1935

Co-Counsel for Intervenor Purchasing Groups and Preferred Concepts

Terry Cummings

HITCHCOCK & CUMMINGS LLP

120 West 45th Street

Suite 405

New York, New York 10036

Tel.: (212) 688 3025, ext. 102


Fax: (212) 688 3040

Co-Counsel for Intervenor Purchasing Groups and Preferred Concepts

Date: June 12, 2014

Respectfully submitted,

Bryan L. Clobes
Ellen Meriwether
CAFFERTY CLOBES MERIWETHER & SPRENGEL LLP
1101 Market Street, Suite 2650
Philadelphia, PA 19107
Tel.: (215) 864 2800
Fax: (215) 864 2810

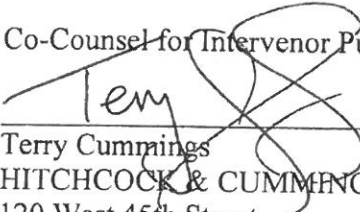


Joe R. Whatley, Jr.
Edith M. Kallas
WHATLEY KALLAS LLP
1180 Avenue of the Americas
20th Floor
New York, NY 10036
Tel.: (212) 447-7060
Fax: (800) 922-4851

Plaintiff's Co-Lead Counsel on Behalf of Class Counsel

Joel M. Simon
SMITH MAZURE DIRECTOR WILKINS
YOUNG & YAGERMAN, P.C.
111 John Street
New York, New York 10038
Tel.: (212) 964 7400
Fax: (212) 374 1935

Co-Counsel for Intervenor Purchasing Groups and Preferred Concepts



Terry Cummings
HITCHCOCK & CUMMINGS LLP
120 West 45th Street
Suite 405
New York, New York 10036
Tel.: (212) 688 3025, ext. 102
Fax: (212) 688 3040

Co-Counsel for Intervenor Purchasing Groups and Preferred Concepts

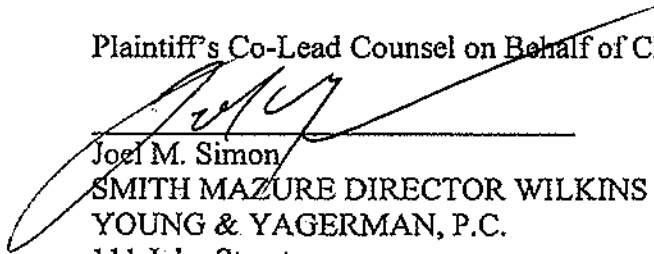
Date: June 12, 2014

Respectfully submitted,

Bryan L. Clobes
Ellen Meriwether
CAFFERTY CLOBES MERIWETHER & SPRENGEL LLP
1101 Market Street, Suite 2650
Philadelphia, PA 19107
Tel.: (215) 864 2800
Fax: (215) 864 2810

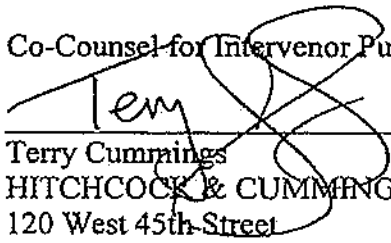
Joe R. Whatley, Jr.
Edith M. Kallas
WHATLEY KALLAS LLP
1180 Avenue of the Americas
20th Floor
New York, NY 10036
Tel.: (212) 447-7060
Fax: (800) 922-4851

Plaintiff's Co-Lead Counsel on Behalf of Class Counsel



Joel M. Simon
SMITH MAZURE DIRECTOR WILKINS
YOUNG & YAGERMAN, P.C.
111 John Street
New York, New York 10038
Tel.: (212) 964 7400
Fax: (212) 374 1935

Co-Counsel for Intervenor Purchasing Groups and Preferred Concepts



Terry Cummings
HITCHCOCK & CUMMINGS LLP
120 West 45th Street
Suite 405
New York, New York 10036
Tel.: (212) 688 3025, ext. 102
Fax: (212) 688 3040

Co-Counsel for Intervenor Purchasing Groups and Preferred Concepts



Elizabeth B. Sandza

WILSON ELSEER MOSKOWITZ EDELMAN & DICKER LLP

700 11th Street, NW, Suite 400

Washington, D.C. 20001

Tel.: (202) 626 7660

Fax: (202) 628 3606

Attorneys for the Zurich Defendants